

IN THE COURT OF COMMON PLEAS
FRANKLIN COUNTY, OHIO

ALIA SHEIKH-HUSSEIN
14 Colonial Oaks Ct. Apt. C
Louisville, KY 40214

Plaintiff

vs.

GENPAK LLC
845 Kaderly Dr.
Columbus, Ohio 43228

Defendant

CASE NO. **09 CVH 10 16268**
JUDGE

JURY TRIAL DEMANDED

FILED
COMMON PLEAS COURT
FRANKLIN CO. OHIO
2009 OCT 30 PM 1:04
CLERK OF COURTS

COMPLAINT

Plaintiff Alia Sheikh-Hussein, individually, through her attorney Kendall D. Isaac
and The Isaac Firm LLC, and in its Complaint against Defendant Genpak state as
follows:

1. Plaintiff was sent to Genpak via a temporary assignment through CBS
Personnel and was to begin March 20, 2008.
2. Genpak is located in Franklin County, Ohio making jurisdiction and venue
proper.
3. Plaintiff is Somalian and practices the Suni Muslim religion.
4. As a part of Plaintiff's religion, she is required to wear a head scarf
(Hijab).
5. The job assignment information sheet that Plaintiff received from CBS
Personnel Service stated that she would be allowed to wear a hair net which would be

provided.

6. Plaintiff was willing and ready to place the hair net over her head scarf.

7. When Plaintiff arrived at Defendant's facility, she was advised by the Front Desk lady that they do not hire people with scarves and that she would have to take off the scarf in order to work.

8. Plaintiff explained for the lady that due to her religion she could not remove the scarf. The lady then advised Plaintiff that there was nothing that she could do for Plaintiff.

9. Plaintiff asked to speak to Lee Schoenstra, the individual she was assigned to report to.

10. The lady refused Plaintiff the opportunity to speak to Lee Schoenstra and denied Plaintiff the opportunity to work. Defendant never re-contacted Plaintiff individually or through CBS to return to an assignment at their facility.

11. On or about March 20, 2008, Plaintiff filed a discrimination charge with the Ohio Civil Rights Commission.

12. On or about December 11, 2008, the Commission issued a decision which determined that there was probable cause to believe that Plaintiff was discriminated against on the basis of her religion.

13. Due to Defendant's conduct, Plaintiff has had to receive psychological counseling and treatment.

CAUSE OF ACTION

14. Plaintiff Alia Sheikh-Hussein re-alleges and incorporates, as if fully rewritten herein, each and every averment set forth in paragraphs 1 through 13.

15. Defendant's conduct towards Plaintiff is discriminatory treatment on the basis of her religion in derogation of Ohio Revised Code 4112 and Title VII 42 USCA § 2000e et seq. (Count 1).

16. Defendant's conduct towards Plaintiff amounts to discriminatory treatment on the basis of national origin in derogation of Ohio Revised Code 4112 and Title VII 42 USCA § 2000e et seq. (Count 2).

17. Defendant's conduct towards Plaintiff rises to the level of an intentional infliction of emotional distress (Count 3).

18. WHEREFORE, Plaintiff, Alia Sheikh-Hussein, respectfully prays this Honorable Court enter judgment in her favor and against Defendant for back pay, front pay, compensatory, general and punitive damages, attorney fees, court costs and for any other relief this court deems just.

Respectfully Submitted,


Kendall D. Isaac, Esq. (0079849)
THE ISAAC FIRM, L.L.C.
341 S. Third St. Suite 10
Columbus, OH 43215
(614) 755-6540, (614) 221-6740 fax
Kendall@theisaacfirm.com